

REMARKS

Claims 1-3, 5, 7 and 10-13 were rejected under 35 U.S.C. 103(a) on the grounds of obviousness from Leshem in view of Espy, and further in view of Horst et al., Hillis, Dekoning, et al., Swanson et al. and Brant et al. Claim 1 recites "a first server including a first controller and at least one CPU;" "a second server including a second controller and at least one CPU," and "at least one of said servers being operative to establish direct communication between the first and second controllers, and said first and second controllers being operative to maintain direct communication between the first and second controllers independent of said at least one CPU of said first server and said at least one CPU of said second server." The Examiner indicated that it would have been obvious to use the separately programmable processor "which can act independently of the CPU 1 to control the storage units" S1-S5, suggested in Brant et al. at column 7, lines 24-28, to meet the claim limitation noted above. The Examiner further asserted that Fig. 8 of Brant et al. shows a controller-to-controller interface (812, 813) which allows controller-controller direct communication independent of the CPU. However, there is no teaching, disclosure or suggestion in Brant et al. that the programmable processor which is used to control the storage units S1-S5 independently of the CPU can be used to establish direct communication between the two controllers, or maintain direct communication between the two controllers independently of the CPU, or that the two controllers maintain direct communication between the two controllers independent of the CPU, as is claimed. Brant et al. discloses a first memory interface 808 and a second

memory interface 811, but there is no teaching, disclosure or suggestion that the memory interfaces, which could presumably include a processor to communicate with storage independent of the CPU, are equivalent to the controller-controller interfaces.

Implementing the modification suggested by the Examiner would only allow the controller-controller interfaces the ability to control the storage units independently of the CPU, but not to control and maintain direct communication between the two controllers independent of the CPU, as is claimed. It is therefore respectfully submitted that Claims 1-3, 5, 7 and 10-13 are novel and inventive over Leshem, Espy, Horst et al., Hillis, Dekoning, et al., Swanson et al. and Brant et al., either individually or in combination, and that the rejection of Claims 1-3, 5, 7 and 10-13 on the grounds of obviousness from Leshem in view of Espy, and further in view of Horst et al., Hillis, Dekoning, et al., Swanson et al. and Brant et al. should be withdrawn.

Claims 6, 16, 19-21, 23, 24, 28-31 and 34 were rejected under 35 U.S.C. 103(a) on the grounds of obviousness from Leshem in view of Espy, and further in view of Horst et al., Hillis, Dekoning et al., Swanson et al., Brant et al. and Harvey. Claims 6 and 16 depend from Claim 1. Claim 19 recites "at least one of said first and second servers being operative to establish direct communication between the first and second controllers, and said first and second controllers being operative to maintain direct communication between the first and second controllers independent of said at least one CPU of said first server and said at least one CPU of said second server." The Examiner indicated that Brant et al. teaches this limitation. The Examiner referred to Fig. 4 of Brant et al. a showing two controllers having direct communication with each other, and

Fig. 8, as indicated above. In Fig. 4, there is no teaching, disclosure or suggestion in Brant et al. that the programmable processor which is used to control the storage units S1-S5 independently of the CPU can be used to establish direct communication between the two controllers 403, 405, or maintain direct communication between the two controllers independently of the CPU, or that the two controllers maintain direct communication between the two controllers independent of the CPU, as is claimed. As to Fig. 8, there is no teaching, disclosure or suggestion in Brant et al. that the programmable processor which is used to control the storage units S1-S5 independently of the CPU can be used to establish direct communication between the two controllers, or maintain direct communication between the two controllers independently of the CPU, or that the two controllers maintain direct communication between the two controllers independent of the CPU, as is claimed, as discussed above. It is therefore respectfully submitted that Claims 19-21, 23, 24, 28-31 and 34 are novel and inventive over the Leshem, Espy, Horst et al., Hillis, Dekoning et al., Swanson et al., Brant et al. and Harvey, either taken individually or in combination, and that the rejection of Claims 6, 16, 19-21, 23, 24, 28-31 and 34 on the grounds of obviousness from Leshem in view of Espy, and further in view of Horst et al., Hillis, Dekoning et al., Swanson et al., Brant et al. and Harvey should be withdrawn.

Claims 8, 9, 17, 18, 25-27, 35 and 36 were rejected under 35 U.S.C. 103(a) on the grounds of obviousness from Leshem in view of Espy, and further in view of Horst et al., Hillis, Dekoning et al., Swanson et al., Brant et al., Harvey and Kimura et al. Claims 8, 9, 17 and 18 depend from Claim 1, discussed above, and Claims 25-27, 35 and 36 depend

from Claim 19, discussed above. It is therefore respectfully submitted that Claims 8, 9, 17, 18, 25-27, 35 and 36 are novel and inventive over Leshem, Espy, Horst et al., Hillis, Dekoning et al., Swanson et al., Brant et al., Harvey and Kimura et al., either individually or in combination, and that the rejection of Claims 8, 9, 17, 18, 25-27, 35 and 36 on the grounds of obviousness from Leshem in view of Espy, and further in view of Horst et al., Hillis, Dekoning et al., Swanson et al., Brant et al., Harvey and Kimura et al. should be withdrawn.

In light of the foregoing remarks, it is respectfully submitted that the application is in condition for allowance, and an early favorable action in this regard is respectfully requested.

Respectfully submitted,

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